



Central Valley Regional Water Quality Control Board

12 October 2020

Diane Printz-White City of Fresno – PARCS 1515 E. Divisadero Street Fresno, Ca 93721



ADDITIONAL INVESTIGATION WORKPLAN, MAXIE L. PARKS COMMUNITY CENTER, FORMER IMPERIAL LAUNDRY, 2165 S. ELM AVENUE, FRESNO

Central Valley Water Quality Control Board (Water Board) staff have reviewed the *Additional Imperial Laundry Investigation Work Plan* (Workplan), dated 25 September 2020, and prepared by Kleinfelder on your behalf as the owner of the subject property (Site) in response to our letter dated 8 June 2020. Reportedly, a dry-cleaning business operated at the Site between approximately 1948 and 1970. Results of the recent Site Investigation indicated the presence of dry-cleaning solvents, including tetrachloroethylene (PCE) and petroleum hydrocarbons, in the subsurface at the Site. A summary of the Workplan and staff comments on the Workplan follows.

Workplan Summary

The Workplan is intended to provide for further assessment of the extent of impacted soil, soil gas, and groundwater; evaluate the potential for vapor intrusion into the Community Center; address comments provided by Water Board staff in the 8 July 2020 letter response to the 15 May 2020 *Former Imperial Laundry Investigation Report*. The proposed scope of work includes:

- Installation and sampling of three additional sub-slab soil vapor probes inside the Community Center and sampling of the existing sub-slab soil vapor probes,
- Advancing to varying target depths, a minimum of six CPT/MIP borings at the Site, with an additional 3 locations – time permitting,
 - o One within the footprint of the former dry cleaner building, 60 feet below ground surface (bgs) target depth,
 - One on the northern end of the Site, 120 feet bgs target depth,
 - One adjacent to the on-Site groundwater monitoring well, 120 feet bgs target depth,
 - o One adjacent to VMP-5, which had elevated concentrations of PCE, 60 feet bgs target depth,

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- One located in the southwestern corner of the empty lot immediately to the south of the Site, 120 feet bgs target depth,
- One adjacent to the Former Elzay S Launderette south of the Site.
 The Workplan does not provide a rationale or specify a target depth,
- Time permitting, three near the former dry cleaner building at the Site, with 20 feet bgs target depth, with one between the former dry cleaner building and the Community Center building, one near the center of the former dry cleaner footprint, and one on the southeast corner of the former dry cleaner footprint.
- Collection of an additional round of indoor and outdoor active and passive ambient air samples in similar locations to the previous sampling event,
- Sampling of the on-Site groundwater monitoring well and the monitoring well network associated with the adjacent Valley Gas underground storage tank site to the northwest,
- Analysis of all samples for volatile organic compounds (VOCs), and groundwater samples for VOCs and total petroleum hydrocarbons,
- Preparation of a report that documents the field methods and analytical results and evaluates the nature and extent of constituents of concern at the Site and potential for vapor intrusion.

Comments

During a 9 October 2020 phone call, Bill Schmierer clarified that the CPT/MIP boring adjacent to the former Elzay S Launderette south of the Site was chosen to evaluate the location as a possible upgradient source of VOCs. The boring has a target depth of 120 feet bgs. Central Valley Regional Water Quality Control Board staff have no objections to the City of Fresno implementing the Workplan. Please submit a report which documents workplan implementation, including conclusions and recommendations for additional assessment and corrective action by 5 January 2021. Please provide a 48-hour notice before beginning fieldwork. If you have any questions regarding this matter, please contact Chad Neptune of this office at (559) 445-5584 or chad.neptune@waterboards.ca.gov.

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cc: Fresno County Environmental Health Division, Fresno
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